

Wiley, Rein & Fielding

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FEC MAIL ROOM

2001 MAR 20 P 5:15

1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 719-7000

**Trevor Potter**  
(202) 719-4273  
tpotter@wrf.com

Fax: (202) 719-7049  
www.wrf.com

March 20, 2001

Lois G. Lerner, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

MUR # 5184

Re: Complaint Urging Investigation of the Atlantic List Company, Inc.

Dear Ms. Lerner:

Attached please find the original, and two copies of a Complaint against the Atlantic List Company, Inc. We are submitting this complaint on behalf of our client, McCain 2000, Inc.

If you have any questions, please do not hesitate to call me at the above number.

Sincerely,

  
Trevor Potter

980369

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
MAR 21 10 32 AM '01



March 20, 2001

Lois G. Lerner, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: Complaint Urging Investigation of the Council for Responsible Government

Dear Ms. Lerner:

McCain 2000, Inc. files this complaint, alleging a violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, and the accompanying attachments pursuant to 2 U.S.C. § 437g(a) against the Atlantic List Company, Inc., 2425 Wilson Blvd., Suite 500, Arlington, VA 22201.

**I. Factual Background**

I served as the Comptroller and Assistant Treasurer for Senator John S. McCain's 2000 Presidential campaign committee ("McCain 2000"). I also was involved with obtaining and preserving the records of the contributors to McCain 2000 and supervising our staff, vendors, and consultants involved in this process. Several individuals who contributed to McCain 2000 have never contributed to a federal or state candidate or political committee other than their \$1,000 contributions to McCain 2000. These "unique" individuals are not listed on any other candidate's or committee's state or Federal Election report. McCain 2000 never publicized these unique names in any form *except* on the Federal Election Commission reports. Accordingly, these unique individuals should not be on any other political fundraising lists.

Beginning in December, 2000 and continuing until as recently as January 31, 2001, three separate fundraising letters have been sent by the Republican National Committee ("RNC") and Ayn Rand to these unique contributors. A copy of each of these flyers is attached as Attachment A. The RNC has confirmed that it received these names from the "Country Club Republicans" and "Great American Donor File" lists. Likewise, Ayn Rand has confirmed that it compiled the names for its mailing from the "Republican Businessmen Who Donate" list. The web site of the Atlantic List Company confirms that it maintains all three of these lists. *See* Att. B.

**www.mccain2000.com**

735 N. St. Asaph Street • Alexandria, VA 22314  
703-837-2000 • 703-837-2001 Fax • 877-905-7700 Toll Free  
Paid for by McCain 2000, Inc.

Based on the above facts and my—and our vendors' and consultants'—experience in political fundraising, I believe that the unique names and addresses obtained by the Atlantic List Company in assembling its lists came from McCain 2000 FEC reports and have been misappropriated for commercial purposes. I also have reason to believe that if action is not taken to prevent their future use, this misappropriation will continue.”<sup>1</sup>

## II. Violation

The Federal Election Campaign Act of 1971, as amended (“FECA”), provides that information copied from reports filed with the FEC “may not be sold for the purpose of soliciting contributions or for commercial purposes.” 2 U.S.C. § 438(a)(4). Likewise, Federal Election Commission (“FEC”) regulations provide that “[a]ny information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed under the Act, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose.” 11 C.F.R. § 104.15. “The prevention of list brokering . . . is the purpose of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.” FEC Adv. Op. 1980-78. The focus of these provisions is to protect “the privacy of the ‘very public spirited citizens’ who make contributions to campaigns.” *Id.* (quoting 117 Cong. Rec. 30058 (1971) (remarks of Senator Bellmon, amendment sponsor)).

The Atlantic List Company crafted and sold lists that contained unique contributor names and addresses found only on the McCain 2000 FEC reports to the RNC for solicitation purposes. To my knowledge, the names and addresses of the “unique” individuals solicited could only have been improperly obtained from reports filed with the FEC. Accordingly, the Atlantic List Company has infringed on the “very public spirited citizens” who contributed to McCain 2000 in violation of 2 U.S.C. § 438(a)(4).

## III. Prayer For Relief


For all of the above reasons, McCain 2000 requests that the FEC expeditiously investigate this violation, enforce 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, and thereby protect the privacy of McCain 2000 contributors and take all other necessary actions to ensure that the Atlantic List Company is brought into full compliance with the federal election laws.

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<sup>1</sup> On March 20, 2001, Trevor Potter, Counsel on behalf of McCain 2000, delivered a cease and desist letter to Eilene M. Black, President and Chief Operating Officer of the Atlantic List Company. *See* Att. C.

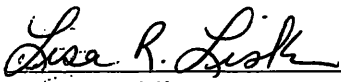
IV. Verification

I, Allen Haywood, swear that the facts set out above are true and correct to the best of my knowledge, information, and belief.

  
Allen Haywood  
Comptroller/Assistant Treasurer

March 20, 2001  
Dated

Sworn and subscribed to  
before me this 20<sup>th</sup> day of  
March 2001.

  
Notary Public  
My Commission expires: 9-30-02

21 04 405 1820

2001

Wednesday Morning

Dear Friend,

On behalf of President-elect George W. Bush and Vice President-elect Dick Cheney I am honored to present your 2001 Republican National Committee membership card ...

... With a personal invitation to join the RNC today to help seize the opportunity our Party won on Election Day!

On November 7, 2000 George W. Bush and Dick Cheney won the closest national election in American history. We defended that victory against an extraordinary assault over the succeeding weeks. We stood firm, and we prevailed.

For the first time since 1952, we can celebrate the election of a Republican president AND Congress.

As you know, it was a long, tough fight -- but it is now time to put the rancor of the election and the bitterness of the post-election battles behind us ...

... And reach out to ALL Americans to enact the common-sense reform agenda that carried us to victory on November 7:

- Cut taxes for ALL working Americans, reduce the marriage penalty and end death taxes;
- Honor the promise of Social Security for today's seniors, and improve Social Security for future generations by establishing personal retirement accounts;
- Expand health care options for ALL Americans, including improved prescription drug coverage for the elderly; and
- Reform and strengthen education with a renewed commitment to the education of every child.

These are large goals. Achieving them will not be easy. But starting on Inauguration Day, with YOUR help, we can begin to make them a reality. Please take a moment right now to return the enclosed RNC Membership Acceptance Reply with your 2001 membership contribution of \$25, \$50, \$100 or more ...

(Over, please ...)

1381 504 40 1321

... And carry your RNC membership card with pride in our Party, confidence in our cause, and enthusiasm for the battles ahead!

President-elect Bush and our leaders in Congress will need your help. Our opponents are tough and determined.

We have just seen how far they will go to win.

And now they will fight our reforms with the same intensity they poured into their assault on the electoral results.

That's why it is essential for ALL of us to unite to keep the Republican reform agenda on track. Your support is important.

**And the best way you can help President-elect George W. Bush, Vice President-elect Dick Cheney, and our leaders in Congress meet that challenge is to join the RNC today!**

The Republican National Committee is our Party's official coordinating body. It is funded through the voluntary contributions of grassroots Republican activists like you.

Your RNC membership enables the RNC to provide state-of-the-art training, research, party-building programs, advertising and direct financial support to Republican candidates at all levels.

The RNC is the ONLY Party committee, under federal law, that directly supports Republican candidates at all levels from the Courthouse to the White House.

And ONLY the RNC has the unique ability to rush national resources to targeted races anywhere in the country to counter the labor Union Bosses, personal injury trial lawyers and other liberal special interests that bankroll the Democrat Party.

- Your support is extremely important. The liberal Democrats truly believe in bigger government and higher taxes.
- They want government control of health care.
- They do not believe parents should control their

(Next page, please ...)

21-04-405-1822

children's educations.

- And the liberal Democrats will stop at nothing to win.

The stakes are high -- for ourselves, for our children and grandchildren, for our nation. And NOW is the time to act!

We won a tough, close election. We have earned the chance to lead. The legislative battle begins on Inauguration Day. Please join me in carrying our message to the American people with the same intensity as we put into the campaign.

With the Congress narrowly divided, this will be a test for our entire Party, top to bottom, from the White House and Congress to the grassroots.

We must remain true to the great principles of our Party and the agenda with which we won last November 7.

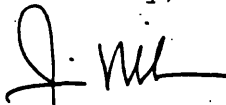
We must bypass the liberal media and get our message out to the American people.

And we must give President-elect Bush and the GOP Congress the grassroots political support they need to pass our agenda into law.

So again, please accept my thanks for your selfless commitment to our Party and country. And please accept your RNC membership for 2001 with a generous contribution of \$25, \$50, or even \$100.

November 7, 2000 gave us an opportunity. We won the chance to lead America in a new direction. Please help our Party take the next step. Thank you.

Sincerely,



Jim Nicholson  
Chairman

P.S. As you know, the election of a Republican president and Congress is historic. It is the opportunity we sought for many years, and now it is here. We need every Republican pulling together to pass our agenda into law and to sustain our success.

You ARE the Republican Party. Please support our Party in the battles ahead by sending your 2001 membership contribution of \$25, \$50, \$100 or more to the RNC today. Thank you.

21-04-405-1823

2001

Dear Jim. I am proud to accept my 2001 RNC Membership Card. On Election Day we won a great victory. Now we must join together to pass our agenda into law. To help build strong Republican grassroots organizations and get our message out to the American people. I am sending a 2001 membership contribution of:

☐ \$25 ☐ \$50 ☐ \$75 ☐ \$100 ☐ \$250 ☐ Other \$ \_\_\_\_\_

*Thank you for your support.  
I like to make my contribution by credit card.  
Please see reverse side for details.  
Thank you for your support.*

Please make check payable to: RNC  
Contributions to the Republican National Committee  
are not deductible as charitable contributions  
for federal income tax purposes.

901289151-G465 AIPC97) COUNTRY CLUB REP.

Paid for by the Republican National Committee. Funds received in response to this solicitation will be deposited in the RNC's federal account unless otherwise prohibited. Federal election law requires us to report the following information\*:

Occupation\*: \_\_\_\_\_

Employer\*: \_\_\_\_\_

☐ Please check if self-employed\*.

Telephone number ( ) \_\_\_\_\_

e-mail address: (H) \_\_\_\_\_

(W) \_\_\_\_\_

*Contributions from foreign nationals are prohibited.*

You may make your 2001 Membership Renewal contribution to the RNC by credit card if you choose by completing the information below:

Type of Credit Card: ☐ Personal ☐ Corporate  
☐ Visa ☐ MasterCard ☐ American Express ☐ Discover

Credit Card Number: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

Name as it Appears on Card: \_\_\_\_\_

Signature: \_\_\_\_\_

Amount of Gift: \$ \_\_\_\_\_

Thank you for renewing your commitment to the Republican National Committee for 2001. The RNC is the official national party organization leading the campaign for Republican victories at the federal, state and local levels. Your early membership renewal is greatly appreciated.

To have an immediate impact you may contribute to the RNC online at [www.rnc.org](http://www.rnc.org). Thank you.

21.04.405.1824



REPUBLICAN  
NATIONAL  
COMMITTEE

2001



**2001 Membership Enclosed**

P1

**BUSINESS REPLY MAIL**

FIRST-CLASS MAIL PERMIT NO. 10169 WASHINGTON DC

POSTAGE WILL BE PAID BY ADDRESSEE

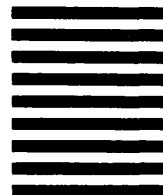
**REPUBLICAN NATIONAL COMMITTEE**

**310 FIRST STREET SE**

**PO BOX 96994**

**WASHINGTON DC 20077-7556**

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES



21.04.405.1825

**2001**

**REPUBLICAN NATIONAL COMMITTEE  
2001 SUSTAINING MEMBER DRIVE**

HNF AQV03

Dear Jim, I am proud to accept my 2001 RNC Membership Card. On Election Day we won a great victory. Now we must join together to pass our agenda into law. To help build strong Republican grassroots organizations and get our message out to the American people. I am sending a 2001 membership contribution of:

☐ \$25 ☐ \$50 ☐ \$75 ☐ \$100 ☐ \$250 ☐ Other \$ \_\_\_\_\_

[REDACTED]

*Thank you for your membership  
renewal in the RNC for 2001.  
If you would like to make your  
contribution by credit card,  
please see reverse.  
Thank you for your support.*

Please make check payable to: RNC  
Contributions to the Republican National Committee  
are not deductible as charitable contributions  
for federal income tax purposes.

01750831-K303 A1PE60

Paid for by the Republican National Committee. Funds received in response to this solicitation will be deposited in the RNC's federal account unless otherwise prohibited. Federal election law requires us to report the following information\*:

Occupation\*: \_\_\_\_\_

Employer\*: \_\_\_\_\_

☐ Please check if self-employed\*.

Telephone number ( ) \_\_\_\_\_

e-mail address: (H) \_\_\_\_\_

(W) \_\_\_\_\_

*Contributions from foreign nationals are prohibited.*

Thank you for renewing your commitment to the Republican National Committee for 2001. The RNC is the official national party organization leading the campaign for Republican victories at the federal, state and local levels. Your early membership renewal is greatly appreciated.

You may make your 2001 Membership Renewal contribution to the RNC credit card if you choose by completing the information below:

Type of Credit Card: ☐ Personal ☐ Corporate  
☐ Visa ☐ MasterCard ☐ American Express ☐ Discover

Credit Card Number: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

Name as it Appears on Card: \_\_\_\_\_

Signature: \_\_\_\_\_

Amount of Gift: \$ \_\_\_\_\_

**To have an immediate impact you may contribute  
to the RNC online at [www.rnc.org](http://www.rnc.org). Thank you.**

21 04 405 1326

REPUBLICAN  
NATIONAL  
COMMITTEE

2001



**2001 Membership Enclosed**

P1

**BUSINESS REPLY MAIL**

FIRST-CLASS MAIL PERMIT NO. 10169 WASHINGTON DC

POSTAGE WILL BE PAID BY ADDRESSEE

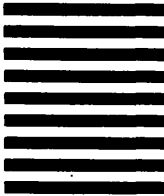
**REPUBLICAN NATIONAL COMMITTEE**

**310 FIRST STREET SE**

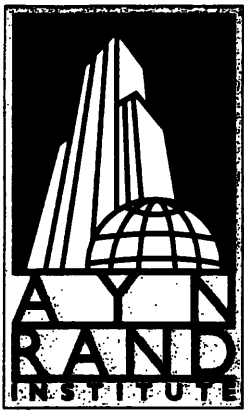
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**WASHINGTON DC 20077-7556**

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IN THE  
UNITED STATE



21-07-405-1827



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☐ **YES, please send a free copy of Ayn Rand's "The Meaning of Money" and accept my donation in the following amount:**

- ☐ \$35  
☐ \$50  
☐ \$100  
☐ \$500  
☐ Other \$ \_\_\_\_\_

• Please make checks payable to the Ayn Rand® Institute. You will receive a receipt from ARI for each contribution you make. Contributions are deductible for U.S. federal income and estate tax purposes, to the extent allowed by law.

PM00D11-2



• There is no minimum contribution, but those who wish to receive the monthly newsletter must contribute \$35 or more annually.

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2001-504-40-12

Occasionally we exchange names with carefully selected organizations. If you do not wish your name and address included in such exchanges, please check here ☐.

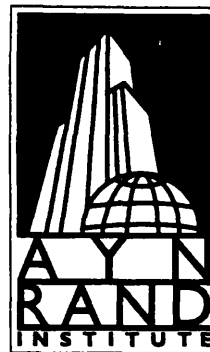
Rep. [redacted] men who Donate

Country Club Rep

For Maryland contributors: A copy of ARI's current financial statement is available on request. Write to or call: Ayn Rand Institute, 4640 Admiralty Way, Suite 406, Marina del Rey, CA 90292, (310) 306-9232. For the cost of copies and postage, information filed under the Maryland charitable organizations laws can be obtained from the Secretary of State. For Mississippi contributors: The official registration and financial information of the Ayn Rand Institute may be obtained from the Mississippi Secretary of State office by calling (888) 236-6167. Registration by the Secretary of State does not imply endorsement. For New Jersey contributors: Information filed with the Attorney General concerning this charitable solicitation may be obtained from the Attorney General of the state of New Jersey by calling (973) 504-6215. Registration with the Attorney General does not imply endorsement. For New York contributors: A copy of the latest annual report can be obtained from the Ayn Rand Institute or from the Attorney General by writing the Office of the Attorney General, Charities Bureau, 120 Broadway, New York, New York 10271. For North Carolina contributors: Financial information about this organization and a copy of its license are available from the State Solicitation Licensing Branch at (919) 807-2214. The license is not an endorsement by the state. For Pennsylvania contributors: The official registration and financial information of the Ayn Rand Institute may be obtained from the Pennsylvania Department of State by calling tollfree within Pennsylvania, (800) 732-0999. Registration does not imply endorsement. For Virginia contributors: Financial statements are available from the State Division of Consumer Affairs. For Washington contributors: The Ayn Rand Institute is registered with the Secretary of State. Information relating to ARI's financial affairs is available from the Secretary of State: 1-800-332-4483. For West Virginia contributors: West Virginia residents may obtain a summary of the registration and financial documents from the Secretary of State, State Capitol, Charleston, WV 25305. Registration does not imply endorsement.

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21-04-405-1829



To: Business Professionals and Investors

As an ardent champion of capitalism, novelist-philosopher Ayn Rand (author of *Atlas Shrugged* and *The Fountainhead*) regarded businesspeople as modern-day heroes. In one essay, she observed that the capitalist "is the great liberator, who in the short span of a century and a half has released men from bondage to their physical needs, has released them from the terrible drudgery of an eighteen-hour workday of manual labor for their barest subsistence, has released them from famines, from pestilence, from the stagnant hopelessness and terror in which most of mankind had lived in all the pre-capitalist centuries and in which most of it still lives today in non-capitalist countries."

Unfortunately, despite the crucial role played by businessmen in liberating mankind, their efforts have met with sustained hatred and opposition from entrenched anti-capitalist mentalities in both the government and academia. The growing chorus of voices calling for the shackling of scores of successful corporations, under the rubric of antitrust laws, is only the most recent example of this all-out attack on production, profit and liberty.

In our judgment, what these great liberators desperately need themselves is—liberation. At the Ayn Rand Institute (ARI), we intend to do our best to offer the intellectual ammunition they need to fight back.

Early in 1998, the Institute took part in a major investment conference in Las Vegas. ARI's exhibit attracted great attention among the conference attendees, and we distributed more than 3,000 copies of "The Meaning of Money" (excerpted from *Atlas Shrugged*) to visitors. At the event, we saw firsthand what we had suspected for some time: many businesspeople have been long-time fans of Ayn Rand. Many had read *Atlas Shrugged* twenty, thirty, even forty years ago—and had been inspired in their careers by Rand's heroic portrayal of capitalists.

In addition to distributing thousands of copies of "The Meaning of Money" to businessmen, we produced four new business-oriented pamphlets for general distribution, including Ayn Rand's essays "Antitrust: The Rule of Unreason" and "America's Persecuted Minority: Big Business." Additional essays on the philosophic origins of antitrust and on the difference between political and economic power were also produced and distributed to hundreds of corporate executives and entrepreneurs.

In 1999, the Ayn Rand Institute Press published *Why Businessmen Need Philosophy*, a 203-page collection of essays relating Ayn Rand's ideas to the business community. We have now also completed our Capitalist

The Ayn Rand® Institute • The Center for the Advancement of Objectivism  
4640 Admiralty Way, Suite 406 • Marina del Rey, CA 90292-6617 • U.S.A.

voice: 310-306-9232 • fax: 310-306-4925 • e-mail: [mail@aynrand.org](mailto:mail@aynrand.org) • web: [www.aynrand.org](http://www.aynrand.org)

21-04-405-1830

Self-Defense Kit. This kit will be promoted to CEOs and other corporate leaders. Each kit includes:

- Two books: *Capitalism: The Unknown Ideal* and *Why Businessmen Need Philosophy*.
- An audiocassette of Ayn Rand's interview, "The Robber Barons."
- Two pamphlets based on talks to business leaders: "The Virtue of Profit," by Dr. Gary Hull, and "Philosophy: The Ultimate CEO," by Dr. Harry Binswanger.
- A newly published collection of business-related newspaper columns from ARI's op-ed program.

On the academic front, this is the third year of a nationwide *Atlas Shrugged* essay contest, offering \$10,000 in cash awards to college undergraduate business majors and graduate MBA students. The aim of this project is to introduce a compelling moral defense of productivity and profit-making to the business leaders of tomorrow.

These efforts reflect a continuation of the Ayn Rand Institute's mission: to reach new audiences with our pro-reason, pro-capitalist message. Our essay contests, high school debate program and campus clubs introduce Miss Rand's ideas to young people. For the general public, our media activities have proved to be an outstanding success—after almost three years of concerted effort. We are highly confident that our ongoing efforts to speak directly to the business community will have a similar impact—introducing ARI to the producers whom Ayn Rand regarded as America's "persecuted minority."

Our ability to add to our ever-expanding audience, via a targeted effort to promote Ayn Rand and ARI to the business community, is directly dependent on the support we receive from individuals like you. Your donation will assist us greatly in our efforts to help "liberate the liberators."

Thank you in advance for your consideration.

Sincerely,



Richard E. Ralston  
Managing Director

P.S. We are offering new contributors a free copy of "The Meaning of Money," an excerpt from *Atlas Shrugged*. In it you will find a moral defense of money as "the root of all good."

The Ayn Rand® Institute  
4640 Admiralty Way  
Suite 406  
Marina del Rey, CA 90292-6617

21-04-405-1832





## ATLANTIC LIST COMPANY, INC.

2425 Wilson Blvd., Suite 500, Arlington, VA 22201  
Phone (703) 629 7492 Fax (703) 629 7492

### Atlantic's List of Lists

Health/Humanitarian Donors

Political

Christian Donors/Product Buyers

Ethnic/Religious Donors

Donors to Children's Causes

Military

Senior Donors

Social/Advocacy

Consumer

Financial

Cultural



#### Health/Humanitarian Donors

Alzheimer's Association

Cancer Research Foundation of America

Champions for Children

Children's Rescue Fund Donors (formerly known as World Children's Fund)

Concern for Children Worldwide Donors

Donors Committed to Protect and Preserve the Environment

Epilepsy Foundation

Fine Art Notecard Patrons

**\*NEW\*** - Friends of the Environment

**\*NEW\*** - Joslin Diabetes Center Donors

NACOP/Paralyzed & Disabled Police Officers Fund

Police Family Survivors' Fund

Just Updated - Southern Poverty Law Center Donors

Teaching Tolerance Magazine & Video Subscribers

**\*NEW\*** - Thurgood Marshall Scholarship Fund Donors

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#### Political

African American Republican Donors

Just Updated - Bush Family Nationwide Campaign Donors

Center for the Study of Popular Culture

Just Updated - Christian Right Donors

Christians Renewing America

Claremont Institute

Committed Christians for Moral Action

Concerned Women for America

Just Updated - Country Club Republicans

**\*NEW\*** - Crusaders for Christian Values

Doctors & Dentists Who Donate to Republicans

## Donors to African American Candidates & Causes English Only

Just Updated - God, Home and Country Conservatives

Gray Davis/Jane Harman California Donors

Just Updated - Gray Go-getters

Just Updated - Great American Donor File

Just Updated - Golden-Aged Republicans

**\*NEW\*** - In Defense of Marriage

Just Updated - Jewish Democratic Donors

Just Updated - Jewish Republican Donors

John Engler/Michigan Republicans

Just Updated - Lone Star Donors

Mark Green for Public Advocate

Just Updated - Massachusetts Republican Donors

Mayor Willie Brown Donors

Pataki for Governor Donors

Private Property Rights Donors

Tom Ridge for Governor Donors

Just Updated - Republican Businessman Who Donate

Just Updated - Republican/Conservative Women

Just Updated - Republican Party Builders

Just Updated - Republicans for the New Millennium

Rowland for Governor Donors

Rudolph Giuliani for Mayor

S.W. & A. Political Masterfile

Carol Schwartz Donors

Simply the Best Donor File

Superior GOP Multi-Donors

Robert Taft for Governor Donors

Just Updated - Top Hat Republicans

Just Updated - Well-Heeled Republicans

Western Journalism Center

Christine Todd-Whitman Donors

Anthony Williams for Mayor Donors

Pete Wilson for Governor Donors



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## Christian Donors/Product Buyers

Just Updated - Bee-Alive Christian Health Product Buyers

Children's Rescue Fund Donors (formerly known as World Children's Fund)

Christian Right Donors

Christians Renewing America

Committed Christians for Moral Action

Concerned Women for America

Concern for Children Worldwide Donors

Crusaders for Christian Values

Just Updated - God, Home and Country Conservative Database

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## Ethnic/Religious Donors

African-American College Alumni

Alzheimer's Association Ethnic/Religious Enhanced

Atlantic's Mosaic Donorbase

Just Updated - Atlantic's Spanish Speaking Donors

Epilepsy Foundation Ethnic/Religious Enhanced

Southern Poverty Law Center Jewish Donors  
 The Statue of Liberty – Ellis Island Fdm. – Ethnic/Religious Enhanced  
 The Statue of Liberty – Ellis Island Fdm. Wall of Honor Donors – Ethnic/Religious Enhanced  
 \*NEW\* - Thurgood Marshall Scholarship Fund Donors  
 Veterans Direct Response Ethnic/Religious Enhanced

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## Donors to Children's Causes

Champions for Children Donors  
 Children's Organ Transplant Fund  
 Concern for Children Worldwide Donors  
 Police Family Survivors' Fund  
 Teaching Tolerance Magazine & Video Subscribers  
 \*NEW\* - Thurgood Marshall Scholarship Fund Donors  
 World Children's Fund Active Prime Donors

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## Military

Battle of Normandy Foundation  
 Duty, Honor, Country – Donors to Military Causes  
 Just Updated - Great American Donor File – Retired Military  
 Veterans Direct Response Database



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## Senior Donors

Alzheimer's Association - Lifestyle Enhanced  
 Concerned Women for America - Lifestyle Enhanced  
 Epilepsy Foundation – Lifestyle Enhanced  
 Just Updated - Golden-Aged Republicans  
 Just Updated - Gray Go-getters  
 Simply the Best Seniors  
 Veterans Direct Response Database

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## Social/Advocacy

\*NEW\* - Friends of the Environment  
 Donors Committed to Protect & Preserve the Environment  
 Just Updated - Dynamic American Donors  
 Just Updated - Southern Poverty Law Center Donors  
 S.W. & A. Charitable Donor File  
 Teaching Tolerance Magazine & Video Subscribers  
 \*NEW\* - Thurgood Marshall Scholarship Fund Donors

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## Consumer

21.04.405.1835

Just Updated - Air Atlantic's Frequent Flyer Database  
Just Updated - Atlantic's "Diamonds Are Forever" Newly Engaged Database  
Just Updated - Atlantic's "Here Come The Brides" Newlywed Database  
Just Updated - Atlantic's "Married With Children" Database  
Just Updated - Atlantic's Spanish Speaking Donors  
Just Updated - Bee-Alive Christian Health Product Buyers  
**\*NEW\*** - Back on the Market! - High Tech Households  
Power Productions Fitness Music Buyers

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## Financial

Just Updated - Atlantic's Investor Database  
Just Updated - Atlantic's Investors at Business Address Database  
Just Updated - Atlantic's Ultra Wealthy Investors

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## Cultural

Battle of Normandy Foundation  
Fine Art Notecard Patrons  
Statue of Liberty-Ellis Island Foundation Donors

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21.04.405.1836



## ATLANTIC LIST COMPANY, INC.

2425 Wilson Blvd., Suite 500, Arlington, VA 22201  
Phone (703) 528-7482 Fax (703) 528-7482

### Client List

**This partial list represents the wide variety of non-profit organizations and commercial clients with whom we have worked during our more than 20 year history.**

#### **Health/Humanitarian Organizations**

Aids Action Committee of Massachusetts  
Alzheimer's Association  
American Federation of Police & Concerned Citizens  
Cancer Research Foundation of America  
Epilepsy Foundation  
The Hope School for Children  
Joslin Diabetes Center  
Kempe Children's Foundation  
L.A. Home for the Aging  
National Council for Jewish Women  
National Vaccine Information Council  
Para Los Niños  
World Children's Fund

#### **Cultural/Preservation Organizations**

American Battle Monuments Commission/  
National World War II Memorial  
Battle of Normandy Foundation  
Central Park Conservancy  
The Guggenheim Museum  
The Statue of Liberty/Ellis Island Foundation, Inc.  
The Student Conservation Association  
The U.S. Equestrian Team  
Women in Military Service Association

#### **Military Organizations**

Aerospace Foundation  
Air Force Association  
Air Force Memorial  
American Battle Monuments Commission/  
National World War II Memorial  
Battle of Normandy Foundation  
Marine Corps Heritage Foundation  
U.S.S. Missouri Memorial Foundation

**Christian/Evangelical Organizations**

Book of Hope International  
Concerned Women for America  
Coral Ridge Ministries  
Here's Life Inner City  
International Church Relief Fund  
Larry Jones/Feed the Children

**Political/Social Organizations**

Americans for Fair Taxation  
Americans for Hope, Growth and Opportunity, Inc.  
The Claremont Institute  
Empower America  
National Republican Senatorial Committee  
Republican National Committee  
Southern Poverty Law Center  
Thurgood Marshall Scholarship Fund  
Western Journalism Center

**Consumer**

Bee-Alive Health Product Buyers  
GCR Publishing  
Home Business Magazine  
IBM  
Liquidation.com  
Lotus  
Pace Products  
Power Music  
Public Citizen — Worst Pills, Best Pills Newsletter  
Sony

# Wiley, Rein & Fielding

1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 719-7000

**Trevor Potter**  
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March 20, 2001

Eilene M. Black  
Atlantic List Company, Inc.  
2425 Wilson Blvd., Suite 500  
Arlington, VA 22201

Re: **Demand to Cease And Desist**

Dear Ms. Black:

I represent McCain 2000, Inc., a Virginia corporation with a mailing address at P.O. Box 25382, Alexandria, VA 22313 and registered with the Federal Election Commission ("FEC"), Commission ID. No C00342154.

For the reasons spelled out in the attached complaint filed with the FEC today, our client hereby demands that your company, the Atlantic List Company, Inc., immediately cease and desist from all usage of names derived from McCain 2000 FEC reports. This includes, but is not limited to, the demand that the Atlantic List Company immediately cease and desist from all usage of the following lists: "Country Club Republicans," "Great American Donor File," and "Republican Businessmen Who Donate," so long as they contain the names of McCain 2000 donors derived from FEC reports.

If you have any questions, please do not hesitate to call me at the above number.

Sincerely,



Trevor Potter

21-04-405-1839